

### **Exhibit A-4: Applicant Response to City's Exhibit C-19**

Public Safety questions: (Applicant's response is included in blue italics within the body of the document contained in City's Exhibit C-19).

- Which residents will you serve?
  - o Tacoma, Pierce County, anyone?
    - *Primarily Tacoma and Pierce County, but we do not refuse to assess and determine level of care required for any patient that arrives on-site, regardless of where that patient originates. Please keep in mind our Certificate of Need approval was predicated on the bed need analysis in Pierce County specifically. Other counties are served by hospitals in those jurisdictions.*
  - o Can police officers drop off patients we come in contact with who are in a current mental crisis and are not going to be booked into jail?
    - *Yes, and Tacoma Behavioral Healthcare Hospital ("TBHH") will do its best to expedite the workflow process for police to complete a drop off after assessment and order by the physician.*
    - Will there be any situation a patient will be refused?
      - *Only if TBHH is on divert status due to lack of capacity or capability.*
  - o Can DCRs (Designated Crisis Responders) commit patients for further treatment?
    - *While TBHH will not be an emergency room, it will take patients who are experiencing a psychiatric crisis from DCRs via non-emergency transport.*
  - o So you serve youth?
    - *We are limited by the Certificate of Need process, which allocated 105 beds (90 adult and 15 child beds) to TBHH.*
  - o Do you provide detox care along with mental health?
    - *TBHH will provide services to patients with co-occurring conditions, where there is a psychiatric condition underlying a substance use disorder. As an inpatient psychiatric facility in Washington, substance use services are secondary to primary psychiatric conditions.*
- Will you have security officers 24/7/365?
  - o *Signature has some hospitals with 24/7/365 security officers and some without security officers. Each hospital is decided on a case-by-case basis during the startup process. Signature is not opposed to security officers around the clock.*
  - o Will staffing levels be at a fixed number or based on a number of patients?
    - *Staffing will be based on census (i.e. number of patients), but also on acuity. Therefore, if a physician order increased observations or precautions, TBHH would staff additional personnel accordingly.*
  - o What weapons / tools will they have on them / available to them?
    - *The employees? No weapons will be on or available to them. Signature strives for mechanical restraint free hospitals and devotes considerable time and training for staff to learn techniques from the Crisis Prevention Institute ("CPI"). CPI training is non-violent and intended to de-escalate.*

*Staff will become CPI certified and learn other de-escalation techniques. If de-escalation was unsuccessful, TBHH employees would utilize a therapeutic hold, whereby several employees would secure the patient. Training for therapeutic holds will also be done by TBHH and refreshed frequently. If all else fails, the physician may order medication intervention to ensure patients and employees remain safe.*

- Can they go “hands-on” physical use-of-force?
  - *Yes, but in a therapeutic manner. Please see above.*
- What level of training will they have? Receive periodic refresher training?
  - *There is an extensive orientation followed by periodic re-trainings. Trainings also occur as part of the risk management/quality improvement process to ensure all employees are aware of TBHH’s policies and procedures.*
- Which agency conducts their background check?
  - *TBHH would contract with a third-party vendor to provide the background check.*
- To what level background check is done on them?
  - *There are multiple layers of backgrounds, including criminal, OIG, and other state and federal req*
- Will law enforcement officials be able to remain armed both on the grounds and inside the building?
  - *Largely, yes. However, no weapons are allowed on the units where patients are located. This is for safety reasons, but also because many of our patients may have had traumatic events in their lives and firearms may be a trigger. It is Signature’s policy to avoid those situations by ensuring the units remain weapon-free at all times.*
  - If not, where will they be asked to lock up their firearm?
    - *There will be a lockbox available to any officers and the officers will maintain possession of the key.*
  - Emergency situation involving a SWAT / active shooter situation
    - Officers remain armed
    - *In this kind of event, TBHH would be working with officers to help secure patients safely. We understand officers would remain armed in this kind of situation. We also conduct training for emergency preparedness, which is required at both the state and federal level.*
  - How are officers to respond to complaints of a crime committed to a patient within the hospital?
    - *Patients will have access to phones on the unit and TBHH would provide a private space for patients to make a call to police, if they felt it was needed. In the event a call is made and officers respond, subject to the clinical team’s recommendation and patient consent, TBHH would provide a private space off-unit for the patient and police to have a conversation.*
    - Officers respond armed to location of victim and suspect to interview and if necessary, arrest

- Again, each circumstance is handled on a case-by-case basis. If the situation warrants a private meeting off-unit, TBHH will accommodate. All of TBHH's actions must be in keeping with the clinical team's decisions, which will be evaluated individually.
- What existing alternatives will your hospital employ prior to calling 911?
  - De-escalation, therapeutic holds, medication intervention (as necessary).
  - Escape
    - Will you immediately begin a search or immediately call 911?
      - Depending on each circumstance, typically police are called concurrent with a hospital-wide lockdown and search. If the patient was voluntary and wished to leave, TBHH would handle that differently. If the clinical team had any concern about the patient, then that would also inform the protocol by TBHH administration. Safety is our top priority.
  - Fight
    - Security staff handle or immediately call 911?
      - It is rare that a Signature hospital has to resort to calling police for a patient altercation. Again, de-escalation, therapeutic holds, and medication intervention would occur first. Police would be called if TBHH felt circumstances were beyond its control and it was trying to ensure safety all around.
- Will you be treating sexual offenders currently participating in the Sex Offender Treatment Program?
  - TBHH will not contract or agree with any federal, state, or local agency to provide a treatment program for sexual offenders.
  - Any special security measures for these patients?
    - Increased security staffing?
    - Limit access to youth, vulnerable patients?
    - N/A
- Will you be treating patients that are in-custody from any law enforcement agency (Local, State, Federal)?
  - No patients who have been processed (booked) by any law enforcement agency will be treated at TBHH. TBHH will not contract with any penitentiary or other inmate program or system to provide psychiatric services. If police have a hold on a person and choose not to process that person, but wish to divert such person from going to jail because of a suspected psychiatric condition, then TBHH would accept the patient and assess.
  - If so, what is your security plan?
    - N/A
- What will be your patient discharge procedures?
  - Discharge procedures are heavily regulated (please see the CMS Interpretive Guidance provided to the record, along with the statement provided in Exhibit A-3).
  - Patients must be picked up by someone (family, friend, etc.)

- Will staff ensure a positive pick-up connection by waiting with the patient?
    - *Yes, once a pick-up is arranged, staff would safely see the patient to the patient's support team.*
- What about those who have no one to pick them up &/or have no fixed address?
  - Will you provide transport out-of-the-area?
    - *Yes, after conversation with the patient. Signature attempts to discharge all patients to a support system in an effort to increase positive outcomes. If someone is available out of area, TBHH will arrange transportation in a secure manner. If there is nowhere for the patient to go, TBHH would attempt to place the patient with a shelter or other program.*
    - How far?
      - *There is no set limit – each patient is evaluated on a case-by-case basis.*
  - Bus, Uber, Lyft, Cab?
    - Will staff stay with them as they board their transportation and leave the area? (i.e. bus)
      - *Uber Health and other third-party companies provide secure transportation that will allow TBHH to track a patient to their destination. No stops are allowed and TBHH receives a notification once the patient has reached his/her destination. There may be circumstances where the clinical team recommends a TBHH employee accompany a patient to their destination, but, again, that is determined on a case-by-case basis.*
- As a 24-hour facility in a zoned residential area, will you discharge patients at all hours?
  - City quiet hours are the hours after 10:00 p.m. and before 7:00 a.m. every day of the week.
    - *Traditionally, discharges will be conducted during the day. There may be circumstances where family is only available at night or otherwise an exception has to be made. Again, each will be evaluated on a case-by-case basis under the direction of the patient's clinical team.*
- Will your entire property be fenced (chain link, etc.)?
  - *No, only the areas where there is access to a patient unit or where patients may be located for therapeutic treatment. In those outdoor areas, there will be at least a 12-foot enclosure with wire mesh extending beyond that.*
  - If a secure gate is in place requiring a key pad or RFID card to open, how loud will the mechanism and gate be?
    - *There is no gate in the front of the building. All access is secured through the building. The front door will appear like many hospitals, with the exception that all guests/visitors must be allowed in one-by-one (i.e the*

*front door is monitored by reception – no patient can leave without appropriate discharge or other authorization and all visitors must ring an internal intercom for access). The intercom is not loud and could not be heard off the premises.*

- Will it be heard at all hours of day and night by neighbors?
  - *N/A*
- Will you work with Police during the design and build phase in the area of CPTED (Crime Prevention Through Environmental Design)?
  - *Absolutely. TBHH will be a community partner, and as such, wishes to be as collaborative as possible.*
- Will a designated employee be working with Tacoma Police well before the official opening to walk officers through the facility and be ready to discuss protocols?
  - *There are community liaisons that may be designated to the police department. However, local police relationships are largely maintained by the Chief Executive Officer. The CEO will definitely walk Tacoma Police through the facility before opening to discuss protocols and give a tour.*
- Homeless
  - How will you handle the homeless that may:
    - congregate in and around the property?
    - set up tents / shopping carts / etc.?
      - *Just like any other property owner, TBHH will conduct routine property inspections by administration and the Director of Plant Operations. No services will be provided outside of the inpatient or outpatient process. Therefore, anyone on the premises that is congregating or loitering will be asked to leave or removed.*
- Neighbors
  - Schools
    - 0.2 miles from Bellarmine Preparatory School (9<sup>th</sup> - 12<sup>th</sup> Grade)
    - 0.3 miles from Life Christian Academy (Pre-School - 12<sup>th</sup> Grade)
    - 0.5 miles Tacoma Nature Center Pre School / 1919 S. Tyler St. / Snake Lake (3 - 6-year-old children)
    - 0.6 miles from Foss High School (9<sup>th</sup> - 12<sup>th</sup> Grade)
  - Senior Recovery Center (Park Rose) 3919 S. 19<sup>th</sup> Street (Directly across S. 19<sup>th</sup> Street)
    - Long-term and short-term respite care for seniors
  - *Signature can certainly understand the concern on proximity to the hospital. However, we hope the security plans and protocols have alleviated that concern. TBHH's top priority will be safety of our patients, our staff, and the community. Concerns about escape or danger to the community are reasonable, but those situations are very unlikely to occur. Please keep in mind that our patients are already in this community. The needs analysis conducted through the Certificate of Need process demonstrated a bed need exceeding the TBHH and other nearby*

*psychiatric facility. Right now, people within the Tacoma and Pierce County communities are not receiving adequate access to care. By providing TBHH as a resource, the Tacoma community will be safer for it.*

## **ADDITIONAL/CORRECTIVE INFORMATION FOR THE RECORD**

1. After hearing comments from the public relating to the dense woods beyond a portion of the site, Signature is more than willing to extend the height of the wall to help assuage any concerns. Again, TBHH will be more than equipped to ensure patient, staff, and community safety at all times.
2. There is one area of correction that the Applicant would like to provide, if the Hearing Examiner will accept it:
  - a. During Applicant's testimony relating to the Certificate of Need process, testimony was provided that Applicant has until May 7, 2020 to begin construction. It was incorrectly stated that construction would need to commence by May 7, 2020. That is not the case.